

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JILL BABCOCK, *et al.*,

Plaintiffs,

Civil Action No. 22-cv-12951

v.

HON. JONATHAN J.C. GREY

MICHIGAN, STATE OF, *et al.*,

Defendants.

PLAINTIFFS' INITIAL FACT WITNESS LIST

Pursuant to Fed. R. Civ. P. 16 (b) and (d), and this Court's Case Management and Scheduling Orders (ECF No. 54, ECF No. 117 and ECF No. 155) Plaintiffs, by their counsel, make the following Initial Fact Witness List. Plaintiffs reserve the right to supplement or amend this list as appropriate as discovery and investigation proceed. Expert witnesses will be disclosed in accordance with the Court's Case Management and Scheduling Orders (ECF No. 54, ECF No. 117 and ECF No. 155).

I. PLAINTIFFS' WITNESSES

a. MARGUERITE MADDOX
c/o Plaintiffs' Counsel

b. JILL BABCOCK
c/o Plaintiffs' Counsel

c. ASHLEY JACOBSON
c/o Plaintiffs' Counsel

d. JAIME JUNIOR

c/o Plaintiffs' Counsel

e. MICHAEL HARRIS, President, Michigan Paralyzed Veterans of Michigan

c/o Plaintiffs' Counsel

f. ATTORNEYS JANE DOE, JOHN ROE, JUDGE SMITH, AND OTHERS

c/o Plaintiffs' Counsel

g. DESSA COSMA, Executive Director, KACI PELLAR, Policy Manager, and other members of Detroit Disability Power.

c/o Plaintiffs' Counsel

h. LISA FRANKLIN, Executive Director, LAWRENCE FRANKLIN, III, and other members of Warriors on Wheels of Metropolitan Detroit.

c/o Plaintiffs' Counsel

i. MARQUITTA STANTON

c/o Plaintiffs' Counsel

j. JENNY BABCOCK

c/o Plaintiffs' Counsel

k. MARY SMITH, PAT SMITH, AND OTHERS

c/o Plaintiffs' Counsel

l. GREGORY R. McDUFFEE

Adverse Witness c/o Defendants' Counsel

m. Current Executive Director of the DWJBA and former and current members and officers or directors of the DWJBA

Adverse Witnesses c/o Defendants' Counsel

n. MICHAEL "MIKE" KENNEDY, and other employees of Hines

Adverse Witness c/o Defendants' Counsel

- o. MICHAEL “MIKE” DUGGAN (Current Mayor), the Deputy Mayor(s), and other mayoral appointees in the Current or Future Mayor’s office**
Adverse Witnesses c/o Defendants’ Counsel
- p. WARREN EVANS (Current Wayne County Executive), and other appointees in the Current or Future Executive’s office**
Adverse Witnesses c/o Defendants’ Counsel
- q. CITY OF DETROIT Building Department, Engineering Department, Licensing and Permits Department, Parking Department, Transportation Department, Law Department: Directors and employees.**
Adverse Witnesses c/o Defendants’ Counsel
- r. DETROIT TRANSIT COMPANY, Executive Officer and other employees**
Adverse Witnesses
500 Griswold St.,
Suite 2900
Detroit, Michigan 48226
- s. DOWNTOWN DEVELOPMENT AUTHORITY, Director and other employees**
Adverse Witnesses
500 Griswold St., Ste. 2200 Detroit, MI 48226
and c/o Defendants’ Counsel
- t. The HONORABLE MILTON L. MACK, JR., ZENELL BROWN, and other CURRENT AND PAST STATE COURT ADMINISTRATORS, CURRENT AND PAST REGIONAL and COURT ADMINISTRATORS FROM THE STATE COURT ADMINISTRATIVE OFFICE, and their representatives.**
Adverse Witnesses c/o Defendants’ Counsel
- u. CURRENT OR FORMER CHIEF JUSTICE OF SUPREME COURT, AND CURRENT OR FORMER CHIEF JUDGES OF OTHER STATE OF MICHIGAN COURTS, including Circuit,**

Probate, and District Courts located in Wayne County, Livingston County, Washtenaw County, Detroit, and East Lansing.

Adverse Witnesses c/o Defendants' Counsel

- v. REPRESENTATIVES OF DLZ and of HAMILTON ASSOCIATES, and other entities which have performed the 2007, 2014, 2021, and 2022 CAYMC Accessibility Compliance Review Report, Capital Improvement Plans, and similar reports for any of the Defendants including as to the State the Circuit, Probate, and District Courts located in Wayne County, Livingston County, Washtenaw County, Detroit, and East Lansing.**

Adverse Witnesses c/o Defendants' Counsel

- w. CITY OF DETROIT OFFICE OF DISABILITIES, and its director and assistant director, and other employees, including CHRISTOPHER SAMP**

Adverse Witnesses c/o Defendants' Counsel

- x. BRUCE SIMPSON, CITY OF DETROIT OMBUDSMAN**

Adverse Witness c/o Defendants' Counsel

- y. DETROIT CITY CLERK JANICE WINFREY, CITY COUNCIL PRESIDENT MARY SHEFFIELD, DETROIT CORPORATION COUNSEL CONRAD MALLETT, JR., OR OTHER CURRENT OR FORMER MEMBERS OF THE CITY OF DETROIT ELECTION COMMISSION; the WAYNE COUNTY CLERK, the MICHIGAN SECRETARY OF STATE, and their REPRESENTATIVES**

Adverse Witnesses c/o Defendants' Counsel

- z. STATE TREASURER, COUNTY TREASURER, CITY TREASURER, and their representatives.**

Adverse Witnesses c/o Defendants' Counsel

- aa.** Any witnesses who may become known through further discovery, whether from parties or non-parties.

- bb.** Any witnesses or persons named by Defendants.

cc. Any witnesses or persons needed for purposes of introducing or authenticating any item of evidence.

dd. Any necessary rebuttal witnesses.

ee. Expert witnesses, including those persons named above who may also qualify as expert witnesses, to be named in accordance with the Case Management and Scheduling Orders described above.

Plaintiffs reserve the right to supplement this list of individuals as information about Plaintiffs' claims and/or Defendants' defenses becomes known throughout the course of investigation and discovery.

Dated: January 10, 2025

/s/ Michael W. Bartnik

By: Michael W. Bartnik (P32534)

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CERTIFICATE OF SERVICE

I, Michael W. Bartnik, certify that on January 10, 2025, I electronically served the above Plaintiffs' Initial Disclosures upon all counsel of record at their respective e-mail addresses of record.

Dated: January 10, 2025 /s/ Michael W. Bartnik
By: Michael W. Bartnik (P32534)

LOCAL RULE CERTIFICATION

I, Michael W. Bartnik, certify that this document complies with Local Rule 5.1(a), including: double-spaced (except for quoted materials and footnotes); at least one-inch margins on the top, sides, and bottom; consecutive page numbering; and type size of all text and footnotes that is no smaller than 10-1/2 characters per inch (for non-proportional fonts) or 14 point (for proportional fonts). I also certify that it is the appropriate length. Local Rule 7.1(d)(3).

Dated: January 10, 2025 /s/ Michael W. Bartnik
By: Michael W. Bartnik (P32534)